

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

DEBTOR: SCOTT WILLIAMS JR. : Chapter 13
SARA L. WILLIAMS :
SS#: xxx-xx-2575 : Case No. 14-53102
xxx-xx-0937

NOTICE OF MOTION TO MODIFY PLAN AFTER CONFIRMATION

THE ABOVE DEBTOR HAVING FILED PAPERS WITH THE COURT TO MODIFY THE PLAN AFTER CONFIRMATION.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)

IF YOU DO NOT WANT THE COURT TO ALLOW THE MOTION TO MODIFY THE PLAN AFTER CONFIRMATION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE MOTION TO MODIFY THE PLAN AFTER CONFIRMATION, THEN YOU OR YOUR ATTORNEY MUST FILE WITH THE COURT A WRITTEN REQUEST FOR A HEARING ON OR BEFORE **MARCH 28, 2016**. IF AN OBJECTION IS FILED, A HEARING WILL BE HELD **APRIL 13, 2016 AT 9:30 AM** IN COURTROOM **B**, UNITED STATES BANKRUPTCY COURT, 433 CHERRY STREET, MACON, GA. 31201

IF YOU MAIL YOUR REQUEST TO THE COURT FOR FILING, YOU MUST MAIL IT EARLY ENOUGH SO THE COURT WILL RECEIVE IT ON OR BEFORE THE DATE STATED ABOVE.

ANY REQUEST FOR A HEARING MUST ALSO BE MAILED TO THE MOVING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.

IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY ENTER AN ORDER GRANTING THAT RELIEF.

Dated this **2nd day of March, 2016**.

Alex D. Sanders
Attorney for Debtor
577 Mulberry Street, St. 1515
Macon, Georgia 31201
Phone: (478) 841-9467

Kyle George, Clerk
United States Bankruptcy Court
P.O. Box 1957
Macon, Georgia 31202
Phone: (478) 752-3506

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DEBTOR: SCOTT WILLIAMS JR. : Chapter 13
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MOTION FOR MODIFICATION/AMENDMENT
AFTER CONFIRMATION

COMES NOW, SCOTT WILLIAMS, JR. AND SARA L. WILLIAMS, and respectfully file this Modification/Amendment to their Chapter 13 Plan and respectfully show the court the following:

1.

Debtors assert that the Chapter 13 petition was filed on December 24, 2014, and the plan presented was confirmed on July 10, 2015.

2.

Debtors have had a change in circumstances. Debtor Sara L. Williams lost her job in June of 2014 after having to undergo a knee replacement. She received short term disability until September. The debtor received unemployment from October to January. She applied for Social Security Disability, but was denied. Debtors propose to make the following changes to the plan as heretofore filed.

3.

The debtors propose to make a change to section 2(d) of the plan. The debtors will decrease the monthly payment amount to World Omni Financial Corp. fka SE Toyota Finance to \$450.00 per month on the debt secured by a 2013 Toyota Camry.

4.

The debtors propose to make two changes to section 2(e) of the plan. The debtors will decrease the monthly payment amount to Ally Financial \$290.00 per month on the debt secured by a 2012 GMC Sierra. Additionally, the debtors propose to decrease the monthly payment amount to Badcock to \$30.00 per month on the debt secured by a 2013 Toyota Camry.

5.

The debtors propose to eliminate the disposable income dividend under section 2[n(i)] of the plan.

6.

The plan payment will decrease to \$402.00 weekly. The debtor will make payments for 57 months and anticipate a dividend of 27%.

7.

After notice and opportunity for objections, the Plan as modified/amended should become the Debtor's Plan.

WHEREFORE, the Debtor prays that the Motion for Modification/Amendment of the Chapter 13 be approved.

This day **2nd** day of **March, 2016.**

577 Mulberry Street, Ste. 1515
Macon, GA. 31201
Phone (478) 841-9467
asanders@kelleylovett.com

/s/ Alex D. Sanders
Kelley, Lovett & Blakey, P.C.
Attorney for Debtor
Ga. State Bar No. 081012

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CERTIFICATE OF SERVICE

I, Alex D. Sanders, certify that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that on the 2nd day of March, 2016 I served a copy of the within Notice and Motion for Modification After Confirmation by electronic notice to Camille Hope, Chapter 13 Trustee, and to all parties on the creditors matrix by depositing a copy of same in the United States Mail in a properly addressed envelope with adequate postage to insure delivery:

This 2nd day of March, 2016.

577 Mulberry Street, Ste. 1515
Macon, Georgia 31201
Phone: (478) 841-9467

/s/ Alex D. Sanders
Alex D. Sanders
Attorney for Debtor
Ga. State Bar No. 081012

United States Attorney
Attn: Barbara Parker
Post Office Box 1702
Macon, GA 31202

Elizabeth A. Hardy
440 Martin Luther King Jr. Blvd.
Room 302
Macon, GA 31201

U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Georgia Attorney General
40 Capital Square SW
Atlanta, GA 30334

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

U. S. Securities and Exchange Commission
Atlanta Regional Office
Reorganization Branch
950 East Paces Ferry Rd NE., Ste. 900
Atlanta, GA 30326-1382

#Georgia Dept. of Revenue
Compliance Division
ARCS-Bankruptcy
1800 Century Blvd., NE, Suite 9100
Atlanta, GA 30345-3205

Ally Financial
P O Box 380901
Bloomington, MN 55438-0901

Avant Credit
640 N. LaSalle Drive
Suite 535
Chicago, IL 60654

Bank of America
PO Box 982235
El Paso, TX 79998-2235

Capital One
Customer Service
P.O. Box 30285
Salt Lake City, UT 84130-0285

CFNA/Firestone
P.O. Box 81315
Cleveland, OH 44181-0315

CitiFinancial Bankruptcy Dept.
PO Box 6043
Sioux Falls, SD 57117

Cox Communications
c/o Equidata
PO Box 6610
Newport News, VA 23606-0610

Credit Bureau Associates of Georgia
420 College Street
Macon, GA 31201

Credit One Bank
P.O. Box 98873
Las Vegas, NV 89193

Dell Financial Services
c/o DFS Customer Care Dept.
P. O. Box 81577
Austin, TX 78708-1577

Dell Financial Services
c/o DFS Customer Care Dept.
P.O. Box 81577
Austin, TX 78708-1577

Fingerhut
Customer Service
P.O. Box 1250
Saint Cloud, MN 56395-1250

First National Credit Card
Customer Service
P.O. Box 5097
Sioux Falls, SD 57117-5097

First Premier Bank
P. O. Box 5524
Sioux Falls, SD 57117-5524

Forsyth Street Orthopaedics
1600 Forsyth Street
Macon, GA 31201-1408

George S. Stefanis, MD
310 Hospital Drive
Suite 205
Macon, GA 31217

Guardian Protection Services
174 Thorn Hill Road
Warrendale, PA 15086

Helzberg Private Account
PO Box 4499
Beaverton, OR 97076

Home Depot Credit Services
P. O. Box 790328
Saint Louis, MO 63179

J Franklin Auto Sales
2558 Riverside Drive
Macon, GA 31204

Javoris Williams
4254 Roy Avenue
Macon, GA 31206

Kay Jewelers
Billing Inquiries
P. O. Box 1799
Akron, OH 44309-1799

Kaybee of Macon
446 Third Street
Macon, GA 31201

MABT-Retail
PO Box 4499
Beaverton, OR 97076

Medical Center of Central Georgia
2490 Riverside Drive
Macon, GA 31204

Merrick Bank
P. O. Box 9201
Old Bethpage, NY 11804

Merrick Bank
P. O. Box 5721
Hicksville, NY 11802-5721

Microf
PO Box 70085
Albany, GA 31708

Northland Group Inc.
PO Box 390846
Edina, MN 55439

One Main Finacial
1396 Gray Hwy
Macon, GA 31211

One Main Financial
1396 Gray Hwy
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Pioneer Credit
PO Box 634
Macon, GA 31201

Radiology Associates of Macon
PO Box 1044
Indianapolis, IN 46206-1044

Republic Finance, LLC
3955 Arkwright Road
Suite D
Macon, GA 31210

Sears
PO Box 6282
Sioux Falls, SD 57117-6282

Sears Gold Mastercard
c/o ERS
PO Box 469100
Escondido, CA 92046

Shop Now Pay Plan
CREDIT DEPARTMENT
P. O. Box 2852
Monroe, WI 53566-8052

Southeast Toyota Finance
P O Box 991817
Mobile, AL 36691-8817

Southeastern Pathology
c/o SCA Collections
300 E Arlington Blvd
Suite 6-A
Greenville, NC 27858

Southern Finance
3755 Bloomfield Road
Suite 3
Macon, GA 31206

SYNCB/Belk
PO Box 965008
Orlando, FL 32896-5008

SYNCB/Pep Boys
PO Box 965008
Orlando, FL 32896-5008

Synchrony Bank/Care Credit
P O Box 965061
Orlando, FL 32896-5036

Synchrony Bank/JCP
PO BOX 960090
Orlando, FL 32896-0090

Synchrony Bank/Lowe's
P O Box 965007
Orlando, FL 32896

Synchrony Bank/Walmart
PO Box 965060
Orlando, FL 32896-5060

W. S. Badcock
P. O. Box 232
Mulberry, FL 33860-0232

Wells Fargo
PO Box 5943
Sioux Falls, SD 57117